
April 6th, 2021

Hon. Bernadette Jordan, P.C., M.P.
Minister of Fisheries, Oceans and the Canadian Coast Guard
200 Kent Street, Ottawa, ON
Sent by email

Re: Atlantic Mackerel TAC and Management for 2021 Season

Dear Minister,

The Ecology Action Centre is Atlantic Canada's oldest and largest environmental organization, founded in 1971. We sit on the Atlantic Mackerel Advisory Committee and are part of the Mackerel Rebuilding Working Group.

Given that Atlantic mackerel biomass is now at the lowest level ever recorded, and that past management decisions have failed to encourage population growth, we are writing to recommend decisive action this year that will reduce fishing pressure and give this species space to recover. The science assessment has clear advice that removals from all sources should be as low as possible.

The Ecology Action Centre recommends the Total Allowable Catch (TAC) for the commercial fishery be set at 0 t for 2021 and 2022. We would support an exemption up to 2000 t for personal bait license access, if fully reported and monitored. This is the only management strategy that offers a highly likely probability the population will increase above the Critical Zone. This quota level will also bring Atlantic Mackerel management in line with both the Precautionary Approach Framework (PA) and the Rebuilding Plan Guidelines, which are set to become regulatory requirements shortly.

It is clear with the new assessment results that quota levels set by DFO in the past 4 years have not stopped the continued decline of the mackerel population. Management decisions have been based on projections with marginal likelihoods of population growth – just slightly over 50% probability. Statistically speaking, we have been leaving the recovery of this species up to the flip of a coin. It seemed the decision was to maximize the TAC while attempting to meet the short-term recovery plan objective of limiting further population reductions. The 2021 assessment shows us the dismal failure of such a risky approach. We can now evaluate past management decisions together with the actual population decreases that resulted. The takeaway is clear – marginal projected growth shown on decision making tables did not result in actual realized growth of this population.

Decisions this year with the population at its lowest levels ever must be based on high probabilities of success and focus on the impact we can control – fishing mortality. The projections presented by DFO Science show that with a TAC of 0 t, there is an 85 to 92% probability of growth by 2023, which is in line with what is defined as a “high” probability by the PA. In contrast, maintaining the status quo

with a TAC of 8,000 t results in a probability of growth between 46% and 60% – just as likely to result in decline. A 0 t TAC also has a 51 to 58% probability of increasing the population above the Critical Zone by 2023, almost double the probability an 8,000 t TAC offers.

The science assessment also showed that the exploitation rate of the commercial fishery is now exceedingly high. DFO Science concludes that “rebuilding the stock will also require rebuilding the age structure of the stock which has been eroded by overexploitation”, yet the current exploitation rate of older fish (aged 5+) is 74% per year. Unfortunately, even large recruitment events are quickly eroded by such a high exploitation rate as shown by the 2015 age class. This cohort could have “rescued” the population but was effectively fished out in two years – in 2019 they were 75% of the landings and now only represent 7% of the total population. This large recruitment event was an opportunity for meeting rebuilding objectives that was wasted by maintaining high exploitation rates, and we should learn from this experience.

While we acknowledge that socio-economic considerations are important and that the Atlantic mackerel fishery employs hundreds of Canadians across five provinces, past management decisions have only prolonged the impact on fishing communities. Instead, committing to a short-term closure of the commercial fishery should result in faster rebuilding so that a thriving fishery can exist again in the near future. The Ecology Action Centre supports assistance from the department directly to owner-operator fishermen, small fleets, and plant workers to reduce the burden of any closure.

It is also critical to keep in mind the impacts a collapse of Atlantic mackerel will have on other fisheries as well as the broader ecosystem. The movement in your department toward ecosystem-based fisheries management is extremely positive and acknowledges that decisions made in this fishery have far reaching impacts. Atlantic mackerel is an important source of bait for our lobster fisheries and its continued decline is increasing costs for our inshore fleet. This fish is also an important prey species for many seabirds, marine mammals, and other large fishes of commercial importance. For example, bluefin tuna's main prey is Atlantic mackerel, and there is already evidence that the absence of mackerel from the food chain is impacting tuna which might be detrimental to both the bluefin tuna population and its commercial fishing industry in the near future.

Decisive management action is needed now to rebuild Atlantic mackerel to fulfill your ministerial mandate to “use good scientific evidence” for decision making as well as to rebuild and sustain fish stocks for future generations. Canada's Blue Economy can only thrive if abundance and biodiversity in our ocean are rebuilt.

Sincerely,



Sebastián Pardo
Sustainable Fisheries Coordinator

Cc:
Derek Mahoney, Chair, Atlantic Mackerel Advisory Committee
Jenness Cawthray, Senior Fisheries and Aquaculture Management Officer